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Sent: Friday, November 18, 2005 6:59 PM

To: DNRC HCP

Subject: DNR HCP comments

As a private citizen, whom hunts, fishes, and hikes on public lands, I appreciate the opportunity to comment on the draft Habitat Conservation Plan (HCP) for Department of Natural Resources (DNR) lands, as requested in the Bitterroot Star (October 19, 2005), Prairie Rose (October 11, 2005), and other widely-distributed media.

The comments are drawn from information (using key words in the HCP for DNR lands such as core area, corridor, and so on as search terms) gained through online searches of electronic databases at the Mike and Maureen Mansfield Library, University of Montana University, whose use are available to any citizen, foreign or domestic, as a walk-in; or through use of Google, a commercial online search engine.

The few and brief comments that follow focus on issues central to conservation as described in the scientific literature available online.

1. Core habitat. Fahrig and many other authors suggest the central issue in conservation is loss of habitat loss and not fragmentation nor simplification of habitat structure.

No meaningful estimates of habitat loss, fragmentation or simplification are provided, all of which could affect habitat recommendations in the HCP for DNR lands.

2. Corridors. Rosenberg and others suggest few studies have demonstrated that corridors actually increase the rate of successfully movement of animals between patches.

No meaningful estimates of preferential use of corridors or successful movement by any individuals are provided in the HCP for DNR lands.

Concern over the role of corridors and spread of disease such as chronic wasting disease has increased; i.e., in Canada (www.serm.gov.sk.ca/fishwild), United States (vegsource.com/talk/madcow/messages/93804.html), and is of growing concern to conservation organizations such as the Rocky Mountain Elk Foundation (www.rmef.org/pages/chronic.html).

I share the public concern of major conservation organizations such as the Rocky Mountain Elk Foundation relative to spread of Chronic Wasting and other important wildlife diseases on DNR lands.

No meaningful estimates of how disease, which may negatively influence wildlife, particularly big game, moves across the landscape are provided in the HCP for DNR lands.

3. Governor Sweitzer (in the Missoulian on March 5, 2005, and elsewhere) has expressed concern over the condition of current forests and the impact/costs of wildfire to private Montana citizens and future forests.

No meaningful estimates of the condition of today's forests relative to fire or insect outbreaks are provided in the HCP on DNR lands.

4. Historic. As avid reader of history, Stephen Ambrose's in his book *Undaunted Courage* noted that Lewis and Clark did not see a tree of adequate size for a canoe from Mandan North Dakota to Great Fall Montana. Lewis and Clark saw their first sage grouse near the Marias River. Osborne Russell in the 1836 did not see sagebrush in southwest Montana, only grass. Word, and virtually every other early explorer and naturalist all describe a landscape with fewer trees, and more open space.

No meaningful estimates of the historic landscape are provided as a base for conservation or for the recommendation to apply historic processes as recommended in the HCP for DNR lands.

5. In the Missoulian last Thursday, a lynx plan developed by the US Fish and Wildlife Service was described to include a website. The map of lynx distribution/habitat described on that website differs from that in the HCP for DNR lands.

No meaningful information is provided as to why the two habitats/distributions differ, or, can one tell where lynx are actually located, where they might be if the population expands, or what the effect of future fire and bugs on the landscape might be.

6. References. It was difficult to trace many of the references in the HCP for DNR lands—many are not available through the University of Montana nor did they appear via use of Google. In scientific journals, a peer-reviewed reference is described by the journal name, volume, issue, and pages; or, if unpublished; it is listed as such either as an unpublished mimeo or unpublished document.

No meaningful information in many cases is provided as to the source (i.e., an address for unpublished documents, mimeos and so on) with the full address of the author both either in the form of an email address or regular mailing address for those without email—useful to a private citizen such as myself in understanding the quality of the science behind the HCP on DNR lands.

No meaningful way in addition exists to evaluate the quality of the information used in the development of the HCP unless listed as either a article in a peer reviewed professional journal (with volume, issue and pages listed) or as an unpublished document or unpublished mimeo.

Again, as a private citizen, who uses public lands for hunting, fishing, and hiking, I appreciate the opportunity to offer personal input to the HCP for DNR lands. I further appreciate the fact your request for input on the HCP from private citizens such as myself appeared in local and statewide public media.

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